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CooperativeEnergy.com

July 16, 2019

Via U.S. Mail and E-mail

Ms. Katherine Collier
Executive Secretary
Mississippi Public Service Commission
501 North West Street, Suite 201A
Jackson, MS 39201

FILED
JUL 16 2019
MISS. PUBLIC SERVICE
COMMISSION

RE: Mississippi Public Service Commission
Docket No.: 2019-UA-116

Dear Ms. Collier,

Enclosed herein please find Cooperative Energy's original Motion to Intervene and twelve (12) copies in the above-referenced matter. I have also enclosed a proposed Order to the Motion for the Commission's consideration. Please let me know if you have any questions or concerns.

Sincerely yours,

Stephen B. Jackson
Director of Legal Affairs

SBJ:s

Enclosures

Cc: Frank F. Farmer, Esq.
Chad Reynolds, Esq.
Virden Jones
Shawn S. Shurden, Esq.
Ricky J. Cox, Esq.

FILED

JUL 16 2019

MISS. PUBLIC SERVICE
COMMISSION

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSISSIPPI

COOPERATIVE ENERGY
EA-123-0750-00

DOCKET NUMBER: 2019-UA-116

IN RE: PETITION OF MISSISSIPPI POWER COMPANY FOR A
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY FOR
ENVIRONMENTAL COMPLIANCE ACTIVITIES AUTHORIZING
THE CLOSURE OF THE ASH POND, CONSTRUCTION OF LOW
VOLUME WASTEWATER TREATMENT FACILITIES, AND
CONVERSION OF BOTTOM ASH COLLECTION FACILITIES FOR
THE PLANT VICTOR J. DANIEL ELECTRIC GENERATING
FACILITY IN JACKSON COUNTY, MISSISSIPPI

MOTION TO INTERVENE

COMES NOW Cooperative Energy, EA-123-0750-00, pursuant to RP 6.121 of the
Mississippi Public Service Commission's ("Commission") Public Utilities Rules of Practice and
Procedure ("Rules") and files this its Motion to Intervene in the above styled and numbered Docket
("Motion") and in support thereof, would show the following:

1. Cooperative Energy is an electric power association, duly chartered, organized,
existing and operating under and pursuant to the "Electric Power Association Law", Section 77-5-
201, *et seq.*, of the *Mississippi Code of 1972, as amended*, and is a public utility as defined by
Section 77-3-3(d)(i) of the *Mississippi Code of 1972, as amended*. Cooperative Energy is engaged
in the generation and transmission of electric energy to serve its eleven member electric power
associations operating in 56 counties in Mississippi, *i.e.*, Coahoma Electric Power Association
("EPA"), Coast EPA, Delta EPA, Dixie EPA, Magnolia EPA, Pearl River Valley EPA, Singing
River EPA, Southern Pine EPA, Southwest EPA, Twin County EPA, and Yazoo Valley EPA.

2. On July 9, 2019, a Petition was filed with the Commission by Mississippi Power Company ("MPC"), requesting a certificate for the closure of the ash pond, construction of a low-volume wastewater facility, and conversion of bottom ash collection facilities to ensure compliance with federal environmental requirements at the Plant Victor J. Daniel Electric Generating Facility in Jackson County, Mississippi.

3. As a public utility providing electric service in the State of Mississippi and as a retail and wholesale customer of MPC, Cooperative Energy has a substantial interest in the outcome of this proceeding and requests permission to intervene herein.

4. Service on Cooperative Energy in this proceeding should be made to the following:

Stephen B. Jackson
Director of Legal Affairs
Cooperative Energy
P.O. Box 15849
Hattiesburg, MS 39404-5849
Telephone: (601) 261-2334
Facsimile: (601) 261-2374
E-mail: sjackson@cooperativeenergy.com

and

Nathan Brown
Senior Vice President/Chief Operating Officer
Cooperative Energy
P.O. Box 15849
Hattiesburg, MS 39404-5849
Telephone: (601) 261-2303
Facsimile: (601) 261-2374
E-mail: nbrown@cooperativeenergy.com

WHEREFORE, PREMISES CONSIDERED, Cooperative Energy hereby requests that this Motion to Intervene be received and filed and that this Commission enter its order pursuant to RP 6.121, granting Cooperative Energy leave to intervene as a party and to fully participate as a party in this Docket and granting any such further relief that the Commission deems necessary.

RESPECTFULLY SUBMITTED, this the 16th day of July, 2019.

COOPERATIVE ENERGY

BY: 
STEPHEN B. JACKSON

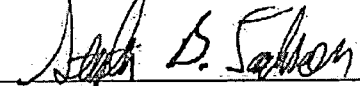
STEPHEN B. JACKSON (MB # 10693)
Cooperative Energy
Post Office Box 15849
Hattiesburg, Mississippi 39404-5849
Telephone: (601) 261-2334
Facsimile: (601) 261-2374
sjackson@cooperativeenergy.com

AFFIDAVIT

STATE OF MISSISSIPPI

COUNTY OF FORREST

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, Stephen B. Jackson, who, being by me first duly sworn, deposed and said that he is the Senior Staff Attorney for Cooperative Energy, and as such is authorized to make this Affidavit; and that the matter and things set forth in the foregoing Motion to Intervene are true and correct as therein stated to the best of his knowledge, information and belief.

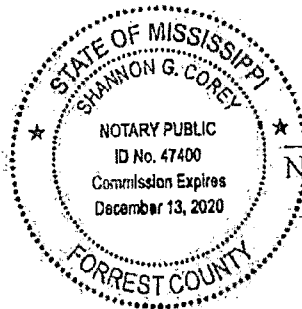


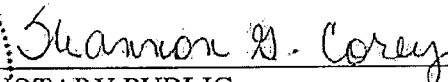
Stephen B. Jackson,
Attorney for Cooperative Energy

SWORN TO AND SUBSCRIBED BEFORE ME on this the 16th day of July, 2019.

My Commission expires:

12/13/20





NOTARY PUBLIC

CERTIFICATE OF SERVICE

I, Stephen B. Jackson, counsel for Cooperative Energy, do hereby certify that in compliance with RP 6 of the Rules, I have caused the original to be filed electronically and twelve copies of the foregoing Motion to Intervene to be sent to:

Ms. Katherine Collier
Executive Secretary
Mississippi Public Service Commission
501 N. West Street
Suite 201A
Post Office Box 1174
Jackson, MS 39201

I further certify that I have this day mailed a copy of the foregoing Motion to Intervene via U.S. Mail to the following:

Frank Farmer, Esq.
Mississippi Public Service Commission
501 North West Street
Suite 201-A
Jackson, MS 39201

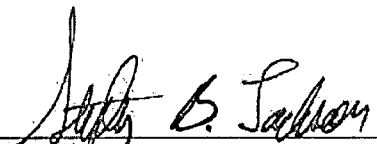
Chad Reynolds, Esq.
Mississippi Public Utilities Staff
501 North West Street
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Jackson, MS 39201

Virden Jones
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Shawn S. Shurden, Esq.
Manager, Regulatory Affairs and Legal Support
Mississippi Power Company
P.O. Box 4079
Gulfport, MS 39502-4079

Ricky J. Cox, Esq.
Balch & Bingham LLP
P.O. Box 130
Gulfport, MS 39501

THIS, the 16th day of July, 2019.



Stephen B. Jackson,
Attorney for Cooperative Energy